



Information for List of Issues

***With regard to the examination of Ireland's Third Report under
the UN Convention Against Torture***

***For consideration at the 69th Session of the
Committee Against Torture
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About ICCL

Founded in 1976, the Irish Council for Civil Liberties (ICCL) is Ireland's leading independent human rights organisations. ICCL has worked tirelessly over 40 years to defend and strengthen constitutional rights protections and to ensure the full implementation of international human rights standards in Ireland. The ICCL draws on the tradition of civil liberties activism in many countries, including the civil rights movements in Northern Ireland, the United Kingdom and the United States. It has developed strong partnerships with a broad range of civil society organisations in Ireland and networks and alliances with similar organisations internationally. ICCL was a founder member of the International Network of Civil Liberties Organisations (INCLO) and a founder and coordinator of the JUSTICIA European Rights Network of 19 civil society organisations working in the area of procedural rights, defence rights, and victims' rights. ICCL is also a member of the Civil Liberties Union for Europe (Liberties).

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Introduction

The Irish Council for Civil Liberties (ICCL) has made submissions to the United Nations Committee Against Torture (CAT), for Ireland's previous reporting cycles, including:

- An joint (along with the Irish Penal Reform Trust) '[alternative report](#)' to Ireland's First report under UNCAT in 2011.¹
- A [submission](#) to the List of Issues on Ireland's second report under UNCAT in 2013²
- An '[alternative report](#)' to Ireland's second report under UNCAT in 2017³
- A '[follow-up report](#)' to the CAT's second set of [Concluding Observations](#) on Ireland, published in August 2017.⁴

This submission provides information to the CAT on what issues remain outstanding from the previous cycle and some additional issues that we consider are relevant to CAT's mandate. Issues outstanding from the previous reporting cycle include the following:

- (1) Ratification of the Optional Protocol to the Convention Against Torture (OPCAT) and systematic inspection of all places of **deprivation of liberty** in the State;
- (2) The effectiveness of State complaints mechanisms and other remedies regarding **Garda (police) malpractice** and the need for **Garda human rights training**;
- (3) The ongoing absence of a thorough and impartial investigation, and effective access to remedies and reparation, regarding institutional abuse in **Magdalene Laundries** and **the practice of symphysiotomy**;
- (4) The **lack of a statutory basis for access to a lawyer** following a person being detained or arrested;
- (5) Dilution of **rules of evidence** as a safeguard against ill-treatment.
- (6) The continuing **use of the non-jury Special Criminal Court** notwithstanding successive calls by the Human Rights Committee for its abolition
- (7) Failure to put in place effective safeguards in response to allegations of **Extraordinary Rendition**
- (8) Ill treatment in the system for reception of asylum seekers, known as **Direct Provision**.

¹ Joint Submission by ICCL and the Irish Penal Reform Trust, April 2011 https://www.iccl.ie/wp-content/uploads/2017/11/ICCL-IPRT-report-email-spread-view-FINAL-21_4_11.pdf

² ICCL submission to List of Issues ahead of Ireland's second report under UNCAT, August 2013 https://tbinternet.ohchr.org/Treaties/CAT/Shared%20Documents/IRL/INT_CAT_NGO_IRL_15586_E.pdf

³ Irish Council for Civil Liberties, Submission to the UN Committee against Torture for the Examination of Ireland's Second Periodic Report (26 June 2017), https://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=INT%2fCAT%2fCSS%2fIRL%2f27963&Lang=en

⁴ United Nations Committee against Torture, Concluding observations on the second periodic report of Ireland, UN Doc CAT/C/IRL/CO/2 (31 August 2017), https://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CAT%2fC%2fIRL%2fCO%2f2&Lang=en

(1) OPCAT and inspection of all places of deprivation of liberty

CAT Recommendations to Ireland in 2017

8. The State party should:

(a) **Immediately ratify the Optional Protocol and establish a national preventive mechanism, ensuring that this body has access to all places of deprivation of liberty in all settings;**

(b) **Ensure that existing bodies which currently monitor places of detention as well as civil society organizations are allowed to make repeated and unannounced visits to all places of deprivation of liberty, publish reports and have the State party act on their recommendations.**

10.

(b) **Expedite the drafting of the Inspection of Places of Detention Bill and ensure that this or other national legislation promptly establishes an independent body tasked with inspecting police stations and monitoring the provision by the police of all fundamental safeguards against torture to persons deprived of their liberty, including respect for the right of prompt access to a lawyer; the rigorous keeping of detention records, including in a centralized register; and systematic closed-circuit monitoring of interview rooms;**

Ratification of OPCAT and establishment of an effective National Preventive Mechanism

Despite signing the OPCAT in 2007, Ireland is now one of only four EU countries that [have not ratified](#) the instrument.⁵ This leaves people who are either legally or *de facto* deprived of their liberty in Ireland in a particularly vulnerable position, because they do not have the protection of the independent, human rights-focused inspection and monitoring system which the OPCAT requires states to establish. Although we have been assured by the Department of Justice that they are working on implementing legislation, draft legislation on OPCAT has still not been published, nor has any written policy been published by the Department of Justice and Equality regarding its intentions for the National Preventive Mechanism.

ICCL has previously expressed its view that the Irish Human Rights and Equality Commission (IHREC) should be the appropriate coordinating body for Ireland's NPM. ICCL has also submitted that it is essential that an appropriate specialist and dedicated police oversight body⁶ should be designated body under the NPM (the Government had previously suggested that the Inspector of Prisons should be given responsibility for inspecting police detention).

⁵ See United Nations Office of the High Commissioner, Status of Ratification Interactive Dashboard, <http://indicators.ohchr.org/>

⁶ Under a program for reform of Irish policing, as outlined in the [report](#) of the Commission on the Future of Policing (CFP) in September 2018, it is proposed that a new Police and Community Safety Oversight Commission' should be established to replace the existing Policing Authority and Garda Inspectorate.

The creation of an NPM in Ireland is urgent given the gaps or uncertainty that exist in the current inspection regime for many places of detention in Ireland. The most significant gap is the absence of any independent statutory inspection of Garda stations. Other areas over which there is some uncertainty as to which body covers inspection, if there are any at all, include transport and transit between prisons and court; court cells; military detention; detention of individuals awaiting deportation; detention facilities at airports and ports and on flights; as well as de facto detention and in voluntary settings.⁷ ICCL believes the NPM must cover places that include all forms of deprivation of liberty in the health and social care arena, and Direct Provision Centres.

In Appendices 1 and 2 of ICCL's ['follow-up report'](#) to the examination of Ireland's second report under UNCAT, where we set out our view of the legal meaning of 'deprivation of liberty' and the remit of OPCAT, and the consequent requirement on the State to include health and social care settings, and Direct Provision Centres, within the purview of the NPM. Appendix 2 to the same report is a copy of the ICCL's March 2018 submission to the Department of Health for its Consultation on the Deprivation of Liberty Safeguard Proposals, which highlights that Irish law continues to be seriously inadequate to ensure protection from arbitrary detention and mistreatment in care settings.

Suggested Inquiries:

- 1.1 *What stage is the current position regarding promised legislation to ratify OPCAT?*
- 1.2 *What is the proposed design of the National Preventive Mechanism and what body does it propose will act as coordinating body? How does the Government aim to ensure that all categories of detention are effectively inspected by expert and sufficiently resourced designated bodies?*
- 1.3 *What steps have been taken to ensure that existing bodies which currently monitor places of detention as well as civil society organizations are allowed to make repeated and unannounced visits to all places of deprivation of liberty, publish reports and have the State party act on their recommendations?*

⁷ Rachel Murray and Elina Steinerte, *Ireland and the Optional Protocol to the UN Convention against Torture* (Irish Human Rights and Equality Commission 2017) 8.

(2) Garda complaints and redress mechanisms

CAT Recommendation to Ireland in 2017

10. The State party should

(c) **Collect data on the performance of the police with respect to provision of fundamental safeguards against torture to persons deprived of their liberty, including data on cases in which police officers have been subjected to disciplinary or other measures for failing to respect such safeguards, and provide this information in its next report to the Committee.**

20. The State party should:

(a) **Strengthen the independence and effectiveness of the Garda Síochána Ombudsman Commission to receive complaints relating to violence or ill-treatment by the police and to conduct timely, impartial and exhaustive inquiries into such complaints;**

(b) **Try persons suspected of acts of violence or ill-treatment and, if they are found guilty, sentence them to punishment commensurate with the gravity of their acts;**

(c) **Provide information on the number of complaints filed with the Commission which may relate to torture or ill-treatment and on the final outcome of such complaints processed by the Commission;**

(d) **Ensure that victims have access to effective remedies and reparation;**

(e) **Sensitize the public about the existence and functioning of the Commission.**

The current Garda complaints body, GSOC, is due for reform under the CFP recommendations. These reforms have not yet been implemented, nor has ICCL seen any draft legislation or written policy on the precise format of the new complaints body. The CFP recognised that, at present, ‘GSOC does not have the resources to investigate independently the volume of complaints it is receiving, and, aside from those involving allegations of a criminal offence, most are passed back to An Garda Síochána. This means that in some cases, the police are investigating serious complaints against themselves’.⁸ The ICCL welcomed the CFP recommendations regarding an independent police complaints mechanism and has called on the Government to legislate swiftly. However, the ICCL has several outstanding concerns which we believe also need to be dealt with in new legislation.

In its last Follow-up Report, the Irish Government did not provide the CAT with any information about the trial or punishment of members of An Garda Síochána who are suspected to have perpetrated acts of violence or ill-treatment.

⁸ CFP Report, at p48.

Suggested Inquiries:

- 2.1 *What steps has the State taken to implement recommendation 20 of CAT's concluding observations 2017?*
- 2.2 *How will proposed new complaints procedures ensure the right to an effective investigation into allegations of torture or ill-treatment, violations of the right to life or other serious human rights violations involving members of the police service? Can the State confirm that any legislative proposals to update the GSOC complaints mechanism will not include the "leaseback" to the Gardaí of complaints involving allegations of criminal or potentially criminal conduct by a Garda member?*
- 2.3 *Will Ireland's new independent complaints body ensure have expert human rights legal input into its frameworks, procedures and substantive practice and policy recommendations? How are the needs of people with disabilities and people in other vulnerable situations to be protected in the proposed reformed complaints process? This might include, for example, independent advocacy, and/or legal representation, and/ or other special measures to enable them to complain of mistreatment and participate in an effective investigation.*
- 2.4 *ICCL is concerned that the present Garda Síochána (Discipline) Regulations 2007 are not consistent with the Garda Code of Ethics, which emphasises the human rights obligations of members of An Garda Síochána. As stated in the Garda Code of Ethics, a breach of the Code is not necessarily a breach of the Disciplinary Regulations.*
- 2.5 *How will complaints which are deemed to involve national security policing operations be dealt with?*
- 2.6 *What data is available regarding the number of cases taken by the DPP against members of An Garda Síochána who are suspected to have perpetrated acts of violence or ill-treatment? What efforts have been made to collect and publish data specifically detailing the number of complaints filed against members of An Garda Síochána which may relate to torture or ill-treatment and their final outcome?*
- 2.7 *Currently, GSOC does not have the power to award any measure of compensation to a person who is determined to have been the victim of Garda malpractice. What mechanism is in place to ensure compensation for victims under the proposed revised police complaints system?*
- 2.8 *There is generally no civil legal aid available for individuals to complain of human rights violations by State actors in the Irish Courts through constitutional actions or actions under the European Convention on Human Rights Act 2003. How does the State party ensure access to the Courts for victims of torture or ill treatment?*

- 2.9 *The ICCL is seriously concerned that special Government-ordered inquiries into Garda conduct under [section 42](#) Garda Síochána Act 2005 are not explicitly required by legislation to act in accordance with the right to an effective investigation into alleged or suspected violations of the right to life, the right to freedom from torture and ill-treatment and other grave human rights violations. How does the State propose to address this gap?*
- 2.10 *What training is in place for members of An Garda Síochána on human rights standards and their obligations in relation to the prevention of torture and ill treatment?*

(3) Magdalene Laundries and Historic Violations

CAT Recommendations to Ireland in 2017

26. The State party should:

(a) Undertake a thorough and impartial investigation into allegations of ill-treatment of women at the Magdalen laundries that has the power to compel the production of all relevant facts and evidence and, if appropriate, ensure the prosecution and punishment of perpetrators;

(b) Strengthen the State party's efforts to ensure that all victims of ill-treatment who worked in the Magdalen laundries obtain redress, and to this end ensure that all victims have the right to bring civil actions, even if they participated in the redress scheme, and ensure that such claims concerning historical abuses can continue to be brought "in the interests of justice"; take further efforts to publicize the existence of the ex gratia scheme to survivors of the Magdalen laundries living outside Ireland; fully implement the outstanding recommendations on redress made by Mr. Justice Quirke; promote greater access of victims and their representatives to relevant information concerning the Magdalene laundries held in private and public archives; and provide information on these additional measures in the State party's next report to the Committee.

Magdalene Laundries

The CAT outlined in its 2017 Concluding Observations that it considers that: "its recommendations to investigate allegations of ill-treatment of women at the "Magdalen Laundries" operated by Catholic Church orders, prosecute perpetrators and ensure that victims obtain redress and have an enforceable right to compensation, have not been implemented".

In fact, the Government's previous report to the CAT made clear that it has no intention to initiate an investigation into alleged torture and ill-treatment in the Magdalene Laundries as recommended by the CAT. The Government claims that the McAleese Committee found "no factual evidence to support allegations of systematic torture or ill-treatment of a criminal nature in these institutions".⁹ The ICCL notes the Government did not give the McAleese Committee the remit to investigate alleged abuse of girls and women in Magdalene

⁹ Ireland, Follow-up report to CAT, 2018, para 14.

Laundries and the Committee did not issue a public call for evidence concerning the treatment of girls and women in Magdalene Laundries. Notwithstanding this, the McAleese report does contain extensive evidence of systematic torture or ill-treatment and criminal abuse of girls and women in Magdalene Laundries. Therefore, the ICCL rejects entirely the Government's previous characterisation of the contents of the McAleese report. In the ICCL's view, the McAleese report and other publicly available evidence provide clear grounds to believe that torture and ill-treatment, and criminal abuse, occurred systematically in the Magdalene Laundries and that therefore a dedicated investigation and truth-telling process is required.

Please see pp. 22-25 of ICCL's [follow-up report](#) for a full discussion of ongoing issues in relation to the Magdalene Laundries in Ireland, including:

- Failure to adequately investigate allegations of torture and ill treatment.
- Failure to hold those responsible for alleged torture and ill treatment accountable.
- Failure to provide adequate remedy and reparation to victims of torture and ill treatment.

Symphysiotomy

In ICCL's 2017 submission to CAT, we also drew attention to the State's failure to provide an effective remedy to victims of symphysiotomy by means of an effective investigation or adequate redress. The State party has ignored the recommendations made by the Committee in respect of survivors of symphysiotomy. Ireland has taken no action in this regard since the Concluding Observations issued in August 2017. There has never been an independent or comprehensive investigation into the practice. No criminal proceedings have ever issued against the perpetrators. Survivors who availed of the government payment scheme were required, as a condition of payment, to abrogate their right to take action against both private and public actors. The scheme made no provision for compensation or rehabilitation on an individualised basis.

Suggested Inquiries:

- 3.1 *When will the State conduct a thorough and impartial investigation into the Magdalene Laundries with the power to compel the production of facts and evidence, leading to prosecution and punishment of perpetrators if appropriate? How will the State ensure that the scheme is independently monitored and how will the appeals process operate?*
- 3.3 *How does the state propose to provide adequate remedy and reparation to victims of torture and ill treatment in Magdalene Laundries?*
- 3.4 *What measures will the State take to ensure former Magdalene residents currently living outside of Ireland are appropriately and adequately included, for example:*
 - *Effective advertising of the Scheme*
 - *Equivalent medical and other social supports (an Irish medical card is an integral component of the Scheme)*

- 3.5 *Why has the State failed to establish an independent statutory inquiry into cases of symphysiotomy, and the policies and practices relating to symphysiotomy, which is empowered and capable of making effective redress to victims, including the payment of adequate compensation, as has been recommended by several international human rights bodies.*

(4) Right to Access a Lawyer as a Safeguard against Mistreatment

CAT Recommendations to Ireland in 2017

10. The State party should:

- (a) Expedite the commencement of section 9 of the Criminal Justice Act 2011 to ensure that all persons deprived of their liberty by the police have the right of access to a lawyer, including during the initial interview and interrogations, from the time of their apprehension, and ensure that this right is respected in law as well as in practice;**

People who are held in police custody in Ireland still do not have the right to have a legal representative present while being questioned by the Gardaí. Ireland has not ‘opted into’ the EU Directive on the right of access to a lawyer in criminal proceedings and on the right to communicate upon arrest, the provisions of which would assist Ireland in addressing concerns regarding access to legal representation. The Directive was formally adopted by the European Parliament on 10 September 2013.

In the course of the Council of Europe Committee for the Prevention of Torture (CPT) visit to Ireland in 2014, the Irish authorities confirmed that all persons detained by An Garda Síochána are specifically asked if they want to consult a solicitor and concludes that “the position now is that An Garda Síochána cannot question a detained person who has requested legal advice until such time as that advice has been obtained”. The CPT was also informed that solicitors are permitted to participate in police interviews and “to intervene where appropriate”, and that the practice of advising detained persons of their right to have legal representation present during an interview was being actively implemented.¹⁰ ICCL understands that following the Supreme Court cases of *DPP v Gormley* and *DPP v White* in 2014, the Director of Public Prosecutions directed that where a detained person requests a solicitor to be present, no interview should proceed until the detainee has an opportunity to consult with a lawyer.

However, the more recent Irish Supreme Court decision in *DPP v Doyle*,¹¹ where the Supreme Court ruled that suspects were not entitled to representation during interviews, is a stark reminder that no such right exists in Irish law, contrary to international and European legal standards. The *Doyle* case was concerned with the right of access to a lawyer during questioning, and while the Supreme Court found that the accused person’s right of access to a lawyer was effectively vindicated in the circumstances of that case, it also found that the

¹⁰ Report of CPT visit to Ireland 16 to 26 September 2014, at para 14.

¹¹ Decision of 18th January 2017.

constitutional right to reasonable access to a lawyer did not extend to a right to have a solicitor present during Garda interviews.

Suggested Inquiries:

4.1 *Will the Irish State commit to put in place effective regulations on the rights of accused persons to access legal advice and to access a solicitor while being questioned?*

(5) Rules of Evidence as a Safeguard Against Ill-Treatment

Under the Irish constitution, the exclusionary rule against the use of unconstitutionally obtained evidence has traditionally acted as an important safeguard against ill-treatment of suspects or accused persons. In April 2015, in the decision of *JC v. DPP* [2015] 1 IR 417, the Supreme Court introduced dramatic changes to the Irish law on improperly obtained evidence. By a slim majority (4-3) it overhauled the exclusionary rule in relation to improperly obtained evidence that had been in operation in this jurisdiction for 25 years by introducing an exception based on 'inadvertence'. ICCL is concerned that the effect of this judgment may be to increase the risk of violations of suspects rights in the gathering of evidence.

Suggested Inquiries:

5.1 *Following the decision of the Supreme Court in the case of *JC v DPP*, what measures is the State party taking to record and collate any instances where police are found to have improperly obtained evidence; and what policies and practices are in place to hold accountable any police officer found to have been engaged in improperly obtaining evidence?*

(6) Special Criminal Court and Right to a Fair Trial

In ICCL's alternative report to the State's first report under UNCAT in 2011, we addressed the issue of continuing use of the non-jury Special Criminal Court in Ireland notwithstanding the cessation of the conflict in Northern Ireland over twenty years ago. The UN Human Rights Committee has consistently called on the Government to renounce the use of the Special Criminal Court, which denies a defendant the safeguard of a trial by jury normally available to accused persons.¹²

In 2009, an amendment to the law further expanded the remit of the Special Criminal Court. Section 8 of the Criminal Justice (Amendment) Act 2009, declared that the ordinary courts are "inadequate to secure the effective administration of justice"²⁷ and extended the range

¹² Concluding Observation of the UN Human Rights Committee: Ireland, 24 July 2000, UN Doc A/55/40, para 15; Concluding Observations of the Human Rights Committee: Ireland, 30 July 2008, UN Doc CCPR/C/IRL/CO/3, para 20; Concluding Observations of the Human Rights Committee: Ireland, 19 August 2014 UN Doc CCPR/C/IRL/CO/4, para 18. See also, Communication No 819/1998: Ireland 26 April 2001, *Kavanagh v. Ireland*, UN Doc CCPR/C/71/D/819/1998.

of offences eligible for trial at the Special Criminal Court to include the offences of directing a criminal organisation, participation or contribution to certain activities and the commission of an offence for a criminal organisation. Discretion remains with the DPP in the 2009 Act and no clear referral grounds are stipulated in the legislation.

The protection of jury members and witnesses was mooted as the reason to extend the remit of the Special Criminal Court. However, the issue of witness intimidation will not be solved by the use of the Special Criminal Court as witnesses will still have to give evidence in court. Rather, ICCL believes the protection of witnesses should be tackled by putting in place measures designed to protect their identities; if necessary, in addition to Garda protection operations.

Suggested Inquiries:

6.1 *ICCL again echoes the recommendations of the Human Rights Committee that the ongoing retention of a non-jury court should be discontinued. At the very least the State should be asked to explain why it believes the ordinary courts are not capable of administering justice during a time of peace.*

(7) Extraordinary Rendition

In our first submission to CAT in 2011, ICCL highlighted the failure of the Irish State to put in place an effective system of monitoring flights passing through Irish airports and airspace which might reasonably be suspected of being involved in illegal practices, such as participating in or facilitating the practices of 'extraordinary rendition'. At this time Ireland continues to refuse to put in place any such system. Contrary to General Comment No. 2 to CAT,⁵⁷ the State continues to argue that it is entitled to rely on diplomatic assurances from the United States that Irish airports have not been used to facilitate rendition. Given the continuing military use of Irish airports by the US military, ICCL continues to argue that a robust system of inspecting all flights is necessary in Ireland.

Suggested Inquiries:

7.1 *Given the ongoing use of Irish airports by the US Military, will the State put in place a robust system of inspection of all aircraft passing through Irish airports in order to meet Ireland's human rights obligations.*

(8) Direct Provision

CAT Recommendation 2017

12. The State party should:

(a) Enshrine in its legislation the principle that asylum seekers should be detained only as a measure of last resort, for as short a period as possible and in facilities appropriate for their status;

(b) Establish a formalized vulnerability-screening mechanism for torture victims and other persons with special needs and provide them with care and protection to avoid retraumatization, including during international protection procedures;

(c) Provide adequate funding to ensure that all persons undergoing the single procedure under the International Protection Act have timely access to medico-legal documentation of torture, ensure that all refugees who have been tortured have access to specialized rehabilitation services that are accessible countrywide, and support and train personnel working with asylum seekers with special needs;

During 2019, ICCL submitted a [report](#) to the Oireachtas Committee on Justice and Equality outlining a range of human rights concerns with the current system of accommodating asylum seekers in Ireland, called the Direct Provision System. As part of this submission, we outlined the following human rights issues raised by the system:

- Cruel, inhuman or degrading treatment (for example, as a result of long-term institutionalisation or an accumulation of conditions in Direct Provision, or by way of abusive incidents by staff or by individuals from whom people living in Direct Provision are inadequately protected);
- Denial of the right to health (due to enforced conditions of living that impair mental health; and lack of access to adequate healthcare for both physical and mental illness);
- Violations of the right to respect for private and family life (including overcrowding; denial of recreational areas for children and adults; stringent limitations on access to food and cooking facilities; unnecessary and unauthorised requirements to produce identity documents; discriminatory or humiliating treatment in legal or employment processes related to certain markers as a person living in Direct Provision or otherwise as an international protection applicant);
- Denials of the right to effective access to the international protection system (for example, due to excessive delays in the application process; lack of access to appropriate and necessary legal assistance, including inadequate legal aid provision; denial of effective access to interpretation and translation; and a lack of monitoring or transparency of certain interviews); 3 See NVH v Minister for Justice & Equality and ors [2017] IESC 35 paras 13, 15, 17. 4
- Denials of the right to access justice and a remedy for rights violations experienced while living in Direct Provision (for example, due to a lack of access to legal aid for European human rights-based or constitutional rights-based claims);

- Arbitrary detention, where individuals are in practice not free to leave Direct Provision settings despite there being no legal basis for their deprivation of liberty.

Suggested Inquiries:

- 8.1 *Whether and if so, when, it intends to end the system of direct provision for asylum seekers and to adopt alternative reception and integration policies to ensure that asylum seekers, including children, are not unfairly disadvantaged or segregated from the community?*
- 8.2 *What steps it has taken to implement the CAT's recommendation in 2017 to "Establish a formalized vulnerability screening mechanism for torture victims and other persons with special needs, provide them with care and protection to avoid retraumatization, including during international protection procedures."?*